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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 KENNETH LIEBSCHER, an individual,

10 Plaintiff,

11 v.

12 COINBASE, INC., a Delaware corporation;  
 Does I through X, inclusive; and ROE  
 13 ENTITIES XI through M, inclusive,

14 Defendant.

15 Case No. 2:24-cv-00148-RFB-EJY

16

17 **UNOPPOSED MOTION FOR**  
**EXTENSION OF TIME**  
**(SECOND REQUEST)**

18 Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1, Defendant Coinbase, Inc. (“Coinbase” or  
 19 “Defendant”), by counsel, respectfully requests a twenty-eight (28) day enlargement of the time to  
 respond to the Complaint of Plaintiff Kenneth Liebscher in this action (“Plaintiff”). In support  
 thereof, Coinbase states:

20 1. On August 28, 2023, Plaintiff filed his Complaint in the Eighth Judicial District  
 Court in and for Clark County, Nevada.

21 2. On December 21, 2023, Coinbase was served with the Complaint.

22 3. On January 22, 2024, Coinbase timely removed the action to this Court. ECF No. 1.

23 4. Coinbase’s current responsive pleading deadline is February 26, 2024. ECF No. 7.

24 5. The undersigned was just recently retained in this action, and requires additional  
 time to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff’s  
 25 Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit  
 26 a proper response to the Complaint. In addition, the parties are in active discussions to amicably  
 27 28

resolve this matter. For these reasons, Defendant respectfully requests a twenty-one (28) day extension of time -- i.e., through and including March 25, 2024 -- within which to respond to Plaintiff's Complaint.

6. This motion is made in good faith and not for purposes of undue delay. No party will be prejudiced by the relief sought. This is Defendant's second request for extension of time.

7. Counsel for Defendant conferred with Plaintiff regarding the extension of time requested herein, who confirmed that Plaintiff does not oppose the relief sought.

WHEREFORE, Defendant Coinbase respectfully requests that the Court grant this Unopposed Motion and extend the time for Coinbase to respond to the Complaint by and through March 25, 2024.

DATED this 23rd day of February, 2024.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ *Brittni A. Tanenbaum*

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## ORDER

## **IT IS SO ORDERED.**

Elyna J. Zouchal  
UNITED STATES MAGISTRATE JUDGE

DATE: February 23, 2024